

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
COLUMBIA DIVISION

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U.S. DISTRICT COURT
MID. DIST. TENN.

ROBERT ZENAS WHIPPLE, III

Plaintiff,

v.

DERRICK SCHOFIELD, et al.

Defendants.

CASE NO. 1:13-cv-00109
CHIEF JUDGE HAYNES
JURY DEMAND

SCANNED

PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

Plaintiff hereby moves this honorable Court to issue a Preliminary Injunction, granting similar relief as that given the Plaintiff, to several prospective class members at Turney Center Industrial Complex ("TCIX"). These prisoners are experiencing irreparable harm in the form of continued physical and mental pain and an increasing risk of medical complications, such as Barrett's Esophagus. In fact, all report being unable to sleep due to this pain and respectfully request the Court to enter a ruling without delay to minimize their suffering.

Each of these class members has written to the TCIX Medical Director with copies to the Health Services Administrator and Warden seeking relief prior to this motion (see Exhibits A, B, D, E). Each has also submitted declarations in which they describe their symptoms and efforts to obtain adequate treatment (see Appendix to Amended Complaint, Docket Entry No. 103-2 and Exhibit F). In addition, Plaintiff has attached a declaration in support of this motion (Exhibit G). As to the law regarding this motion, Plaintiff would argue that the same law is applicable as to the previous Order, and therefore would rely on the Memorandum of Law previously filed (Docket Entry No. 4).

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